

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P.
LUHANA IN SUPPORT OF CHAFFIN
LUHANA LLP'S REPLY IN SUPPORT OF
ITS MOTION TO WITHDRAW AS
COUNSEL**

This Document Relates to:

PLAINTIFF B.F.
Case No. 3:25-cv-04466

PLAINTIFF H.S.01
Case No. 3:25-cv-01999

I, Roopal P. Luhana, declare:

1. I am an attorney and partner in the law firm of Chaffin Luhana LLP. I am a member of the State Bar of New York and am admitted Pro Hac Vice to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. On July 30, 2025, the parties met and conferred regarding Uber's motion regarding potentially non-bona fide ride receipts.

3. During that meet and confer, undersigned counsel specifically requested additional time to investigate Uber's allegations and to speak with the Plaintiffs to discuss what Uber shared with Plaintiffs' counsel for the first time during the meet and confer.

4. Counsel further asked Uber to produce additional information and evidence it

1 possessed concerning Uber's process to assess the disputed receipts so that counsel could investigate
2 Uber's assertions.

3 5. Uber rejected both requests and filed its Motion for an Order to Show Cause (ECF No.
4 3604), which included Plaintiffs B.F. and H.S. 01, hours later.

5 Executed this 26th day of August, 2025, in New York, New York.

7 /s/ Roopal P. Luhana

8 Roopal P. Luhana